March 28, 2025

## Via ECF

Honorable LaShann DeArcy Hall United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Val Cooper

21-CR-00208-LDH

## Honorable Judge Hall:

On behalf of Mr. Val Cooper, I write to respectfully request a modification of Mr. Cooper's bail conditions to remove location monitoring.

On February 3, 2022, The Honorable Magistrate Judge Robert Levy released Mr. Cooper pursuant to the following conditions: (1) a \$1,000,000 bond; (2) cosigned by five financially responsible persons; (3) travel limited to New York City and Long Island, New York; (4) surrender of travel documents; (5) Pre-Trial Supervision; (6) home detention with electronic GPS location monitoring. On July 20, 2022, the Court lifted Mr. Cooper's condition of home confinement and changed it to "Defendant shall be subject electronic monitoring, and a curfew set by Pretrial Services."

Mr. Cooper is now moving to modify his pretrial release conditions, to remove his location monitoring condition. Mr. Cooper has been on pretrial release since February 2022, and it looks like he will likely be sentenced in more than 9 months. Mr. Cooper respectfully moves for the removal of location monitoring for the following reasons:

- 1. Mr. Cooper would like to take a job coaching children's soccer, which he cannot do while wearing an LM bracelet.
- 2. Mr. Cooper's elderly dog requires frequent walks, even during the night, and Mr. and Mrs. Cooper are concerned about Mrs. Cooper's safety when walking the dog alone at night.

3. Mr. Cooper's doctor has recommended swimming to alleviate his worsening back pain, which is not possible with the LM bracelet.

Mr. Cooper's pretrial officer does not object to removing the location monitoring condition. The Government concurs with Pretrial.

**Wherefore**, for the reasons stated above, I respectfully requestthat the Court remove location monitoring from Mr. Cooper's pretrial release conditions.

Mr. Cooper and I thank the Court in advance for its attention and consideration of this Application.

Respectfully Submitted,

By: /s/ Tony Mirvis

By: Tony Mirvis, Esq.

cc: AUSA Bowman (Via Email and ECF) PTSO Baio (Via Email)